Failure Analysis of Insulated

Sheet Metal Siding

Following An MSLB in The Steam and Feedline

Penetration Area

Indian Point Unit 3

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I. Introduction

In an SER dated December 30, 1982 on Environmental Qualification of Electric Equipment Important to Safety for Indian Point Unit 3, the NRC stated that analyses which were submitted by NYPA to NRC were not accepted by the staff for the pressure/temperature service conditions outside on containment.

One of the areas questioned by the NRC staff was the steam and feedline penetration area.

A. <u>Description of the Steam and Feedline Penetration Area</u>

The steam and feedline penetration area is a building located on the West side of the reactor containment building which houses the main steam and feedwater piping and associated isolation valves, safety valves, and supports. The building consists of a concrete shield wall at the West end (which provides biological shielding for streaming paths associated with the containment penetrations for the steam and feedwater pipes) and a steel structure covered with insulated metal siding on the North and South ends. Figure 1 shows the configuration of the building exterior.

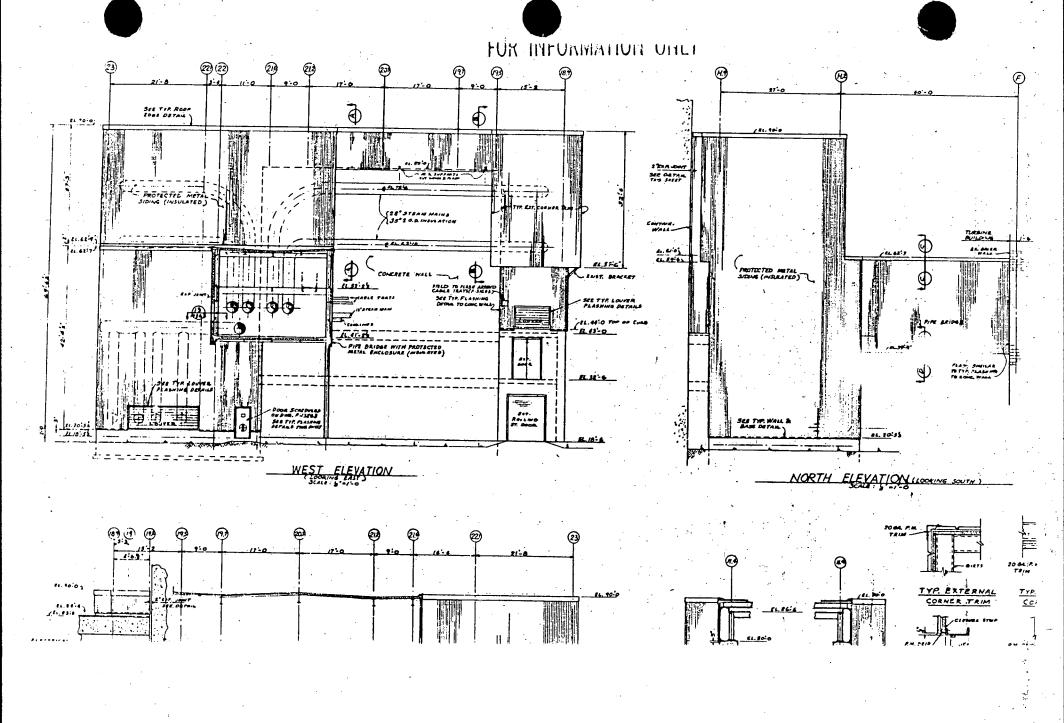
B. <u>Effects of a High Energy Line Break (HELB) in the Steam and Feedline</u> Penetration Area

In the analysis of high energy lines for Indian Point Unit 3 dated May 9, 1973, it was stated that no significant temperature build-up could occur due to the low pressure differential at which the siding panels fail and that temperature buildup would not be significant since the siding would blow off almost immediately following a break. This information was reaffirmed by NYPA in the May 1983 submittal to NRC pursuant to 10CFR50.49.

During a meeting among NYPA and NRC staff representatives on April 25, 1984, it was determined that the COBREE analysis performed by NRC did not consider that the siding would rupture and vent the steam to atmosphere. NYPA indicated that the siding is designed for only a 60 psf (.42 psig) loading and that the failure of the siding would preclude any temperature or pressure buildup in the steam and feedline penetration area. As a result of the discussions, the staff requested NYPA to provide an analysis which confirms that the siding would fail and vent steam to atmosphere in the event of a HELB in the steam and feedline penetration area thereby confirming that there would be no significant pressure and temperature buildup.

C. Purpose of this Report

This report contains the results of an analysis of the effects of a pressure buildup in the steam and feedline penetration area to determine the pressure at which the insulated sheet metal siding would fail and vent the steam to the atmosphere. The analysis uses the GT-STRUDL finite element analysis program which was selected because the program is suitable for structural analysis for Nuclear Power Plants and Quality Assurance is maintained by Control Data Corporation for the Cybernet System.



Software Description

The Integrated Computer Engineering System (ICES) Structural Design Language (STRUDL) is a computer software package used for structural analysis and design. The version employed in this analysis was developed by the Georgia Institute of Technology, and hence the package is usually referred to as GTSTRUDL.

GTSTRUDL allows the user to specify characteristics of structural problems, perform analyses, reduce and combine results, perform designs, and output any part, or all of the information stored in the structural problem data base on a selective basis.

External influences resulting from applied forces, temperature, initial strain (fabrication error), or specified joint displacements (support movement) may be considered to act separately or in any combination as independent loading conditions.

GTSTRUDL analysis procedures perform linear small displacement static and dynamic analyses of structures composed of any combination of members and finite elements with the same or variable number of degrees of freedom per joint. In addition, non-linear geometric and material (large displacement/small strain) static analyses of framed structures may be performed.

Output may be requested by the user in a variety of formats and in any quantity desired. Output may include input data, joint displacements, support reactions, member end forces and distortions, member force, stress and envelope diagrams at any number of points along a member, element stresses and strains, statics check results, etc. Output may be ordered by loading condition, member, element, or joint, and may be requested for one or more combinations of joints, members, elements, and loading conditions (independent and/or dependent).

Software Description (cont'd)

The structural engineer is not required to have any prior knowledge of computers, computer operation, or computer programming in order to analyze and design simple or complex structures. Instead, by using GTSTRUDL, the engineer simply communicates the characteristics of the problem, and procedures to be applied to its solution, by using an English-like Problem-Oriented-Language (POL). The POL is computer independent, easily used and understandable to an engineer, and reflects the terminology a structural engineer would normally use when discussing a problem solution with his colleagues. The POL of GTSTRUDL permits the engineer to dictate his particular problem solving needs to the computer, rather than having to conform to arbitrary computer program requirements. The goal of the POL is to permit the engineer to maintain and exercise his role as decision maker when using computers for structural analysis and design.

The above discussion represents the broadest possible description of the GTSTRUDL Software. A complete description can be found in the GTSTRUDL USER INFORMATION MANUAL (Reference 4).

III. Description of Computer Model

The computer model used to solve the problem described in the introduction uses a thin plate, fixed support model to represent the PLASTEEL C-3 siding section* which covers the exterior of the building structural frame. The particular span that was analyzed is that section which covers the widest structural span. This siding section is considered to be the limiting case because the failure resulting from the loading conditions will produce the maximum venting area for the steam conditions.

The largest span in the building without intermediate support is 19 feet high and 21 feet 8 inches wide. The siding is totally supported by the fasteners between the section liner and the main girts (Interface 1).

In order to model the siding section and determine what pressure load will cause the siding section to fail, it was first necessary to obtain information regarding the materials of construction, method of assembly, and other design data. Enclosure 1 was the information received from the PLASTEEL PRODUCTS CORPORATION.

This information provides both failure information (ultimate capacities) and design limits (safe spans, etc.).

The siding section under consideration is manufactured with a sandwich-type construction. As shown in PLASTEEL drawing L2V-C3 (See Enclosure 1), the section is composed of a vertically corrugated steel cover fastened to horizontal sub-girts (Interface 3). The subgirts are attached to a steel liner (Interface 2). The liner is mounted to the main girts or other structural support members (Interface 1). Insulation fills the space between the liner and cover. Each 24 in. section is fastened to the previous section until the desired width is achieved.

Enclosure 1 contains the information supplied by the siding manufacturer. The following data were obtained from that information:

^{*}See Enclosure 1 for panel description.

Liner - #20 gage steel 24 in. wide (nominal) 0.0359 in. thickness 1.78128 lb/ft²

Sub-girt - #20 gage steel
2.5 in. wide (hat-shaped section)
0.0359 in. thickness

Cover - #22 gage steel 24 in. wide (nominal) 0.0299 in. thickness 1.81902 lb/ft²

Fastener: Interface 1 - 1500# (Pull Over-Liner Shearing) (Ultimate Interface 2 - 800# (Pull-Out) Strength) Interface 3 - 500# (Pull-Out)

The manufacturer's information states that the perimeter fasteners are spaced every 12 inches and that sub-girts are spaced vertically every 16 inches.

PLASTEEL has verified the fastener data and their predicted safe spans with testing. They also stated that a similar C-3 siding section actually failed under steam line break conditions at Fort Martin Station in Virginia, an Allegheny Power Corporation facility.

The possible failure modes to consider are:

- "Pull-Over" The liner actually pulls over (shears) the fastener and washer.
- 2. "Pull-Out" The fastener is pulled through the material it was joining.
- 3. "Shear-Out" The liner tears out perpendicular to the axis of the fastener.

In order to model this complex siding section as a thin steel plate, a simplifying analysis is necessary.

1. Plate

The most important parameter involved in determining the equivalence of using a steel plate to model the siding section is the area moment of inertia (I) about the horizontal or x-axis (see Figure A).

In order to produce a similar physical response to a particular loading condition, the rigidity of the model must approximate the rigidity of the siding section. The rigidity of the siding section is greatest about the x-axis because the corrugations run vertically. The rigidity about the y-axis is less for the siding section; however, for the steel plate Ix = Iy. To determine the equivalent thickness of the steel plate with equal rigidity, Ix for the siding section will be determined and equated to Ix for the steel plate. No credit is taken for the sub-girts in calculating Ix because they provide no rigidity against bending about the x-axis.

This approach produces smaller deflections in the model than would actually occur in the siding section due to the smaller value of Iy for the siding section. Smaller deflections translate to less strain, lower stresses and bending moments, and, consequently, higher pressure loads before failure occurs.

2. Moment of Interia

Liner: The liner is flat except for the ends. The centroid will be considered to be concentrated in the center of the flat section, though the entire area will be used to calculate Ix_1 . This will yield a higher value of Ix_1 .

$$I_{x}^{*}L_{c} = \frac{wt^{3}}{12} = \frac{(24 = 4.75)(0.0359)^{3}}{12} = 1.33 \times 10^{-3} in^{4}$$

2. Moment of Interia (cont'd)

where:
$$W^{**} = 28.75$$
 in; $t = 0.0359$

$$A = (W) (t)$$

$$A = (28.75) (0.0359) = 1.032125 \text{ in}^2$$

$$d = 1.375 + .25 = 1.625 \text{ in}.$$

$$Ix_4^* = Ix_{1_C} + Ad^2$$
and:
$$Ix_L = 1.33 \times 10^{-3} + (1.032125) (1.625)^2$$

$$Ix_L = 1.33 \times 10^{-3} + 2.72545$$

$$Ix_L = 2.72678 \text{ in}^4$$

$$Ix_{f_C} = \frac{\text{wt}^3}{12} = \frac{(33.5) (0.0299)}{12} = 7.46 \times 10^{-5} \text{ in}^4$$
where: $W^{**} = 33.5 \text{ in}$; $t = 0.0299 \text{ in}.$

$$Ix_f = If_{2_C} + Ad^2$$
and:
$$A = (W) (t)$$

$$A = (33.5) (0.0299) = 1.00165 \text{ in}^2$$

$$d = 1.625 \text{ in}.$$

$$Ix_2 = 7.46 \times 10^{-5} + (1.00165) (1.625)^2$$

$$= 7.46 \times 10^{-5} + 2.64498$$

 $= 2.64505 \text{ in}^4$

^{*} Figures B and C show the diagram for calculating the Moment of Interia for these sections.

^{**} Equivalent lengths include all corrugations.

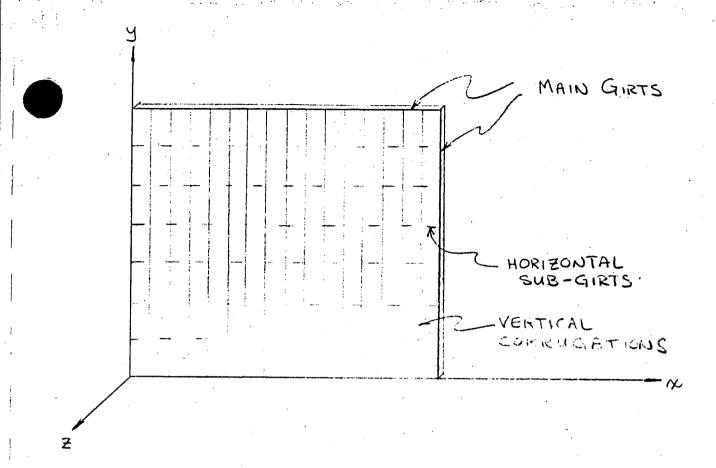


Figure A. Siding Section/Model Orientation

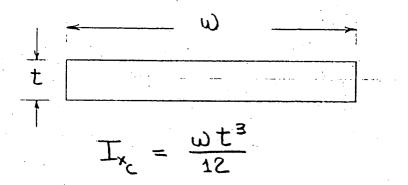


Figure B. Moment of Inertia About Centroidal Axis.

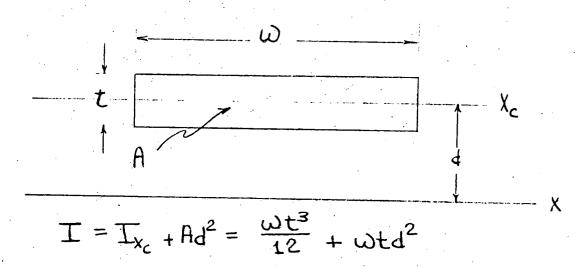


Figure C. Moment of Inertia About
Any Axis

$$Ix_{section} = Ix_{L} + Ix_{f} = 2.72678 \text{ in}^{4} + 2.64506 \text{ in}^{4}$$

= 5.3718366 in⁴

For equivalent rigidity, the following must be true:

$$Ix_{plate} = \frac{wt^3}{12} = 5.3718366 \text{ in}^4$$

$$W = 24 \text{ in.}$$

 $t^3 = (5.3718366) 12$

24

t =
$$3\sqrt{2.6859183}$$
 = 1.39 in. equivalent thickness for steel plate (1.4 in. used in computer model).

Equal moments of interia will result in deflections being approximately equal under the same loading conditions.

A similar calculation for the moment of inertia about the y-axis yields:

Iy =
$$2.7353 \text{ in}^4$$

and t = 1.11 inches

The conservatism, employed in the above calculation justifies the value chosen for the steel plate thickness.

3. Fasteners

The siding section is fastened to the main girts of the building. The fasteners used to hold the siding to the frame will be modeled as fixed support points spaced every 12 in. around the perimeter of the section, as recommended by the siding manufacturer. All axial (tensile or compressive) reaction loads must be carried through these Interface 1 fasteners. Shear forces, however, would be distributed to the Interface 2 and 3 fasteners, proportionally to the number of other fasteners and the deflections at the attachment points. This computer model does not account for shear force distribution. In this model, all shear forces will be carried by the Interface 1 fasteners. However, an approximation on the actual distribution can be made to calculate the shear force on the Interface 1 fasteners.

Fasteners (cont'd)

An additional consideration which offsets some of the uncertainty in the above shear force approximation is the elimination of all body force (weight) loads on the fasteners. The actual weight of a panel section is:

Liner - 1.78128 lb/ft²
Cover - 1.81902 lb/ft²
Subgirts - "few" oz/ft²
Fasteners - "few" oz/ft²
Insulation - "few" oz/ft²

Total _ 3.6003 lb/f² "few oz" = 4.0 lb/ft²

The siding section under examination is:

Height - 19 ft. Width - 21 ft. 8 in. Area = 411.67 ft² Total load = (411.67) (4) = 1646.67 lbs.

If distributed evenly over the 82 Interface 1 fasteners, this results in a shear force of 20 lbs/fastener. Neglecting this load is conservative because it allows the fasteners (Interface 1) to withstand a higher pressure load before reaching the ultimate strength of the fastener or liner.

4. The Model

Our solution uses a finite element analysis to calculate the forces, stresses and displacements throughout the section. A Quality Assured (QA) computer software program, GTSTRUDL, performs the analysis as described in Section II of this report.

The finite element model consists of a thin plate oriented in the x-y plane of a Cartesian coordinate system. The origin is defined as the lower, left-hand corner of the section being analyzed; all dimensions in the model are in inches and are positive. The plate is divided into 418 finite elements and 460 nodes or joints numbered consecutively from left to right and bottom to top. The nodes are located at 12 inch intervals starting from the origin and proceeding in the +x and +y directions (fastener locations). This results in a Nodal mesh of 23 columns and 20 rows; the element matrix contains 22 columns and 19 rows. All elements, except for column 22, are 12 inches square. The last column contains elements which are 8 inches by 12 inches. All elements are 1.4 inches thick and have constant material properties; namely, Modulus of Elasticity = 30 x 106 psi and Poisson's Ratio = 0.3.

4. The Model (cont'd)

GTSTRUDL contains a library of possible finite elements which can be selected in developing the finite element model. Finite elements for plane stress/plane strain, plate bending, etc. are available. Two or three dimensional elements can be used. The emphasis of this analysis is to calculate the reaction forces in the fasteners at each joint; therefore, a simple, rectangular plate bending element was chosen. (GTSTRUDL element library type "BPR".) This is a two-dimensional element which uses the element thickness to calculate element rigidity. Joint displacement at the supports was not permitted so that pressure loads would produce maximum stresses.

IV. Data Reduction

To determine what pressure load will cause failure, it is necessary to analyze 4 areas:

- 1. reaction forces at supports (fasteners) (1bs)
- 2. shear loads at supports (lbs/in)
- shear loads at center joints (lbs/in)
- 4. displacements at center joints (in)

Failure (pull-over) will occur at a reaction force greater than 1500 lbs, as stated by the manufacturer. Severe deflections (\geq 6 inches at the center) will signify pull-out of local fasteners. For support fasteners (Interface 1) shear out failure will occur if the resultant shear load, Vxx or Vyy (see printout) exceed the material limit. For steel,

$$\frac{C_{ULT}}{(T)\left(\frac{\text{Diameter Fastener}}{2\text{ (loaded area)}}\right)} = V_{\text{ultimate}}$$

Vultimate is in lbs. The computer results are in lbs/in. and there are 12 inches in each element perpendicular to one of the four plate edges. This yields:

Vxx or Vyy = 101.68 in. (maximum allowable before shear-out failure occurs).

V. Results and Interpretation

Enclosure 2 contains the results of the GTSTRUDL finite element analysis. The forces, moments, stresses and displacements have been calculated for four loading conditions: 30, 60, 90 and 200 PSF. The forces on each of the Interface 1 fasteners are a combination of the axial (+2 direction) forces due to the pressure load, shear forces due to weight (-y direction, not modeled), and shear forces due to plate bending at the particular point on the plate $(\pm x, \pm y)$ directions).

As the results show, the model closely predicts the analytical solution (Ref. 1, pg. 133-138) for a simply supported rectangular plate. Notice that the corners of the plate tend to curl up as is predicted in the analytical solution. This phenomenam can be seen in the results of the analysis as a change in sign in the reaction forces around the corners of the plate.

The analytical solution presented in Reference 1 predicts a maximum bending stress of:

$$Omax = \frac{Poa^2b^2}{2h^2(a^2+b^2)}$$
 (see figure D)

A numerical solution using the complete thin-plate equations converges to a maximum bending moment which is approximately 15% greater than the analytical solution. The numerical solution of reference 1 is in good agreement with the results obtained using GTSTRUDL.

The pressure loads on the plate produce reaction forces which act axially on the fasteners. Table 1 summarizes the reaction forces for fasteners located at each mid-span (joints 12, 231, 253, 449) and the joint with the highest bending moment (joint 184). The manufacturer's data states that pull-over occurs at 1500 lbs. at Interface 1. The results show that significant (25%) pull-over (shear in +Z direction) occurs at 200 PSF. At the same pressure load, more than half of the fasteners will experience shear out (shear in $\pm x$, $\pm y$ directions) as shown in Table 2.

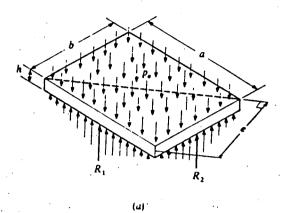


Figure D. Schematic Model

Table 1. Pull-Over (Liner Shear; +Z direction)

Joint No.	Pressure Load, PSF	Reaction Force Lbs.
12	30	-272.06
184	30	-526.19
231	30	-260.69
253	30	-256.97
449	30	-272.49
12	60	-544.12
184	60	-1052.37
231	60	-521.39
253	60	-513.93
449	60	-544.98
12	90	-816.18
184	90	-1578.56
231	90	-782.08
253	90	-770.90
449	90	-817.47
12	200	-1632.36
184	200	-3157.12
231	200	-1564.16
253	200	-1541.79
449	200	-1634.93

Table 2. Shear-Out (Liner Shearing; $\pm x$, $\pm y$ directions)

	Joint No.	Pressure Load, PSF	Shear Load Vxx, <u>lbs</u> in.	Shear Load Vyy, <u>lbs</u> in.
• • • • • • • • • • • • • • • • • • • •	12 184 231 253	30 30 30 30	42.94 19.78 -19.46	20.86
	449	30	-13.40	-20.91
	12 184 231 253 449	60 60 60 60 60	85.88 39.55 -38.93	41.72 -41.82
	12 184 231 253 449	90 90 90 90 90	128.82 59.32 -58.39	62.59 -67.73
	12 184 231 253 449	200 200 200 200 200 200	257.65 118.66 -116.79	125.18 -125.45

V. Results and Interpretation (cont'd)

Similar shear failures will occur on the plate interior as deflections become dramatic as the plate center begins to bulge. GTSTRUDL considers only elastic situations and, therefore, the plastic deformation which would occur is not show. Table 3 provides deflection data at joints near the center of the plate.

Failure of the plate will occur at a pressure load of 1.26 psi which is less than 200 PSF (1.4 psi). The nature of the failure is most probably a combination of the following:

- 1. liner pull-over along supports.
- 2. liner shear-out along supports.
- 3. liner shear-out at internal fasteners.
- 4. fastener pull-out at internal fasteners.

The predominant failure mode will be a combination of Items 1 and 2 and could be catastrophic in nature depending on the time period in which the plate is loaded. However, a quasi-static loading would still produce a "zipper" effect failure.

Table 3. Shear Load and Displacements at Plate Center

Joint	Pressure Load	Vxx	Vyy	Displacement
	PSF	(1bs/in)	(lbs/in)	+Z, in.
170	30	1.81	4.44	0.09
175	30	-2.31	4.68	0.10
285	30	1.84	-2.86	0.09
290	30	-2.16	-2.89	0.10
170	60	3.62	8.87	0.19
175	60	-4.61	9.36	0.20
285	60	3.64	-5.73	0.19
290	60	-4.33	-5.99	0.20
170	90	5.43	13.3	0.28
175	90	-6.91	14.03	0.29
285	90	5.46	- 8.59	0.28
290	90	-6.49	- 8.98	0.29
170	200	10.85	-26.61	0.56
175	200	-13.83	28.07	0.59
285	200	10.91	-17.18	0.56
290	200	-12.98	-17.97	0.59

Note: Bending moments increase as the geometric center is approached.

VI. Conclusions

The results of this analysis indicate that the building siding will start to fail at 0.42 psi and at a pressure load of 1.26 psi the panel will fail completely. The exact failure mode cannot be accurately defined. Only a few general hypotheses about failure modes can be made based on the results of the analysis and assumptions made in generating the computer model; namely,

- uniformly distributed pressure load.
- all fasteners are the same.
- perfect construction (no eccentricities).
- no support displacements.
- totally elastic deformations.

With these assumptions noted, the conclusion of this report is that the PLASTEEL C-3 siding section will fail by a combination of liner material shearing and fastener pull-out to an extent which relieves the pressure (1.26 psi) load which caused the failure.

It should be emphasized, however, that the main steam lines run adjacent to the siding panels throughout the building. A failure of a main steam line will result in siding panel failure through direct steam impingment upon the panels long before pressure in the building increases to the 1.26 psig value discussed above.

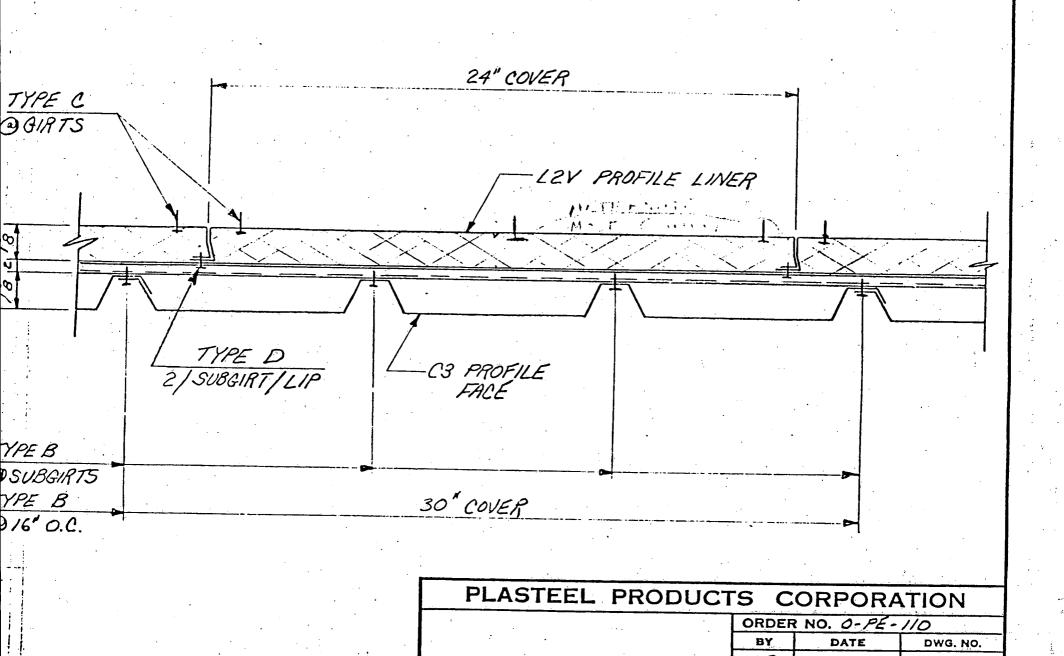
The saturation temperature associated with 0.42 psig is $213^{0}F$. The saturation temperature associated with the peak pressure of 1.26 psig is $216^{0}F$. The difference between $213^{0}F$ and $216^{0}F$ (viz $3^{0}F$) has no effect on the qualification of equipment in the steam and feedline penetration area because the equipment is qualified for temperature in excess of $250^{0}F$ and pressures in excess of 40 psig.

VII. References

- 1. Budynas, R. G., Advanced Strength and Applied Stress Analysis, McGraw-Hill Book Company, c 1977.
- 2. Manual of Steel Constuction, American Institute of Steel Construction (AISC), 7th Edition, c 1973.
- 3. Byars, E. F. and Snyder, R. D., <u>Engineering Mechanics of Deformable Bodies</u>, 3rd Edtion, Intext Educational Publishers, c 1975.
- 4. Emkin, L., Will, K., et. al., GTSTRUDL USER INFORMATION MANUAL, Second Edition, Report No. SCEGIT-79-179, Georgia Institute of Technology, January 1979.

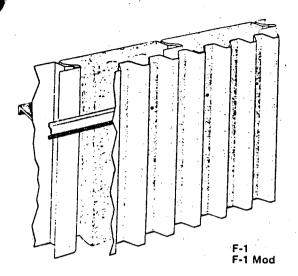
ENCLOSURE 1

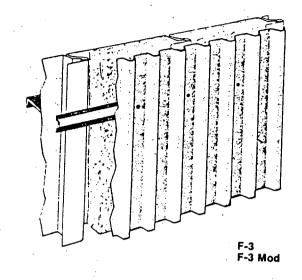
PLASTEEL PRODUCTS CORPORATION SUPPLIED INFORMATION



Plasteel Insulated Wall Systems Type 21 (Span Charts)

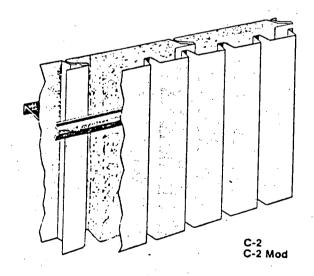
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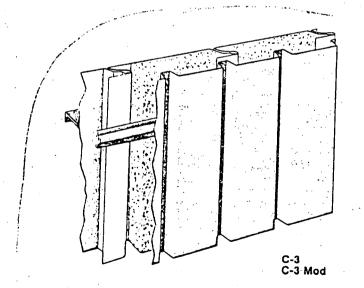




_		,	<u> </u>	STEEL	FACIA		ALUM	INUM FAC	IA
_		L	24ga	22ga	20ga	18ga	20ga B/S	18ga B/S	16ga B/S
LINERS	12"	24 22 20 18	8'-9 9'-0 9'-4 10'-0	9'- 4 9'- 8 9'-11 10'- 5	10'- 0 10'- 2 10'- 5 10'-11	10'-11 11'- 2 11'- 4 11'- 9	7'-5 7'-9 8'-2 9'-0	7'-10 8'- 2 8'- 6 9'- 3	8'- 3 8'- 7 8'-11 9'- 7
		22 20 18	8'-6 8'-8 9'-0	9'- 2 9'- 3 9'- 7	9'- 9 9'-10 10'- 2	10'- 9 10'-11 11'- 2	7'-0 7'-3 7'-9	7'- 5 7'- 8 8'- 2	8'- 0 8'- 2 8'- 7

	STEEL FACIA							LUMINUM	FACIA
_		L	24ga	22ga	20ga	18ga	20ga B/S	18ga B/S	16ga B/S
LINERS	12.	24 22 20 18	7'- 1 7'- 6 7'-11 8'- 9	7'-5 7'-9 8'-2 9'-0	7'-9 8'-1 8'-6 9'-5	8'-4 8'-8 9'-0 9'-8	6'- 5 6'-11 7'- 5 8'- 4	6'-7 ' 7'-1 7'-7 8'-6	6'-10 7'- 4 7'- 9 8'- 7
STEEL	24	22 20 18	5'- 9 6'-11 7'- 6	7'-0 7'-3 7'-9	7'-4 7'-7 8'-1	8′-3 8′-8	5'-10 6'- 3 6'-11	6'-1 6'-6 7'-1	6'- 5 - 6'- 8 7'- 4





		γ	STEEL	ALUI	MINUM FA	CIA		
	1_	24ga	22ga	20ga	18ga	20ga B/S	18ga B.S.	16ga B/S
WERS	24 22 20 3	9'- 3 9'- 6 9'-10 10'- 5	10'-0 10'-3 10'-6 11'-0	10'- 9 10'-11 11'- 2 11'- 7	11'-11 12'- 1 12'- 3 12'- 8	7'-9 8'-1 8'-6 9'-2	8'- 2 8'- 6 8'-10 9'- 7	8'- 9 8'-10 9'- 5 10'- 0
STEF 24	20 18	9'- 0 9'- 2 9'- 6	9'-0 10'-0 10'-3	10'- 6 10'- 8 10'-11	11'-10 11'-11 12'- 1	7'-4 7'-7 8'-1	7'-10 8'- 1 8'- 6	8 - 6 8 - 8 9 - 1

<u> </u>	STEEL FACIA							NUM FAC	A
_,			24ga	22ga :	20ga	18ga	20ga B/S	18ga B/S	16ga B/S
LINERS	15	24 22 20 18	7'-8 8'-0 8'-5 9'-2	8'- 2 8'- 6 8'-10 9'- 6	8'- 8 8'-11 9'- 3 9'-10	9'-6 9'-9 10'-0 10'-7	6'-9 7'-3 7'-8 8'-7	7'- 0 7'- 6 7'-11 8'- 9	7'- 5 7'-10 8'- 2 9'- 0
STEEL	24	22 20 18	7'-3 7'-6 8'-0	7'-10 8'- 0 8'- 6	8'- 4 8'- 6 8'-11	9'-4 9'-5 9'-9	6'-3 6'-7 7'-2	6'- 7 6'-10 7'- 5	7'- 0 7'- 3 7'- 9

FASTENER STRENGTH

PPC	7 / 4 11		FOTT-00.	IN POUN	DS		
TYPE	1/4" PLATE	16 G	18 0	a 20	Ga 22	Ga	24 G
B Point	2500						,
A Point		875	500	400	300	2	a ø
NOTE: Do	uble Thic	kness Mu	ltiply by	2.			
							
	·	· · · · · · · · · · · · · · · · · · ·	PULL-OV	ER IN POL	INDS	•	• .
Standard	•					· · · · · · · · · · · · · · · · · · ·	
5/8	7	3000	2000	1500	1200	. 82	10
1/8							
Vasher			2400	1900	1700		· -
			•	•	_,		
					·		
			ALUMINU	M PANEL			
		.050	.040	.030			
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PROJECTINDIAN RIVER
A.I.S.I. SPECIFICATION1780 DESIGN STRESS=20,000 P.S.I. *****
STEEL FACE PANEL C3 .02990 GAGE
LINER PANEL L2 .03590 GAGE
MAIN GIRT SPACING= 5.FJ. 0.IN.
SUB-GIRT SPACING= 4.FT. O.IN.
DESIGN LOAD = 60.LB. PER SQ. FT.
INSULATED WALL
INTERFACE -1 (LINER TO MAIN GIRT)
PULL OVER LOAD FER FASTENER= 300.LB. SAFETY FACTOR ON DESIGN= 5.00
INTERFACE-2 (SUB-GIRT TO LINER) PULL OUT LOAD PER FASTENER= 240.LB
SAFETY FACTOR ON DESIGN= 3.33
INTERFACE-3 (FACE PANEL TO SUB-GIRT)
PULL OUT LOAD PER FASTENER= 200.LB SAFETY FACTOR ON DESIGN= 2.50
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PROJECT---INDIAN RIVER

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	ند 1 د	INTERFACE-3 (FACE PANEL TO SUB-GIRT)	
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PROJECT---INDIAN RIVER

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ENCLOSURE 5 TO IPN-84-63 JUSTIFICATIONS FOR CONTINUED OPERATION

NEW YORK POWER AUTHORITY

INDIAN POINT 3 NUCLEAR POWER PLANT

DOCKET NO. 50-286

EQUIPMENT TYPE:

LEVEL SWITCH

MANUFACTURER:

GEMS MODEL LS1900

FUNCTION:

CONTAINMENT SUMP LEVEL INDICATION

(LT 938, 939, 940, 941)

LOCATION:

CONTAINMENT

DISCUSSION

The Gems Model LS1900 level switches are installed in the reactor containment sumps. These level switches have no control function but do provide information to the control room operators on the containment sump level. Franklin Research Center (FRC) has issued a Technical Evaluation Report (TER-C5257-456) which discussed the Gems level switches. FRC assigned the level switches to category Ib, Equipment Qualification Pending Modification.

QUALIFICATION DEFICIENCY

Documented evidence of qualification.

JUSTIFICATION FOR CONTINUED OPERATION

The operators have the ability to verify the level provided by the Gems level switches against that provided by the qualified Barton model 764 level transmitters (LT-1253 and 1254), which were installed to measure containment water level per NUREG-0737. This verification will determine if the Gems level switches have failed. As such, the operators will not be misled in the event of a failure of the Gems level switches.

Failure of the Gems level switches will not affect other safety-related equipment because they have no control function and are not connected to other safety-related equipment in containment.

Therefore, continued operation is justified.

FINAL RESOLUTION

The Authority considers that sump level switches can provide useful information to operating personnel. Therefore, either bistables will be incorporated into the circuits for the containment water level transmitters or the Gems switches will be replaced with qualified units.

EQUIPMENT TYPE:

RESISTANCE TEMPERATURE

DETECTOR

MANUFACTURER AND MODEL: SOSTMAN 11901B

FUNCTION:

WIDE RANGE REACTOR COOLANT TEMPERATURE MEASUREMENTS (TE-413 A, B; TE-423 A, B; TE-433 A, B; TE-443 A, B)

LOCATION:

CONTAINMENT

DISCUSSION

The Sostman RTD's are used to measure reactor coolant system cold leg and hot leg temperatures over the range between 70 F and 650 F. They are identified as the wide range reactor coolant system temperature detectors.

The wide range reactor coolant system temperature detectors provide information to the operators on post-accident In particular from the hot leg detectors, the temperatures. operators can determine the core outlet temperature. The cold and hot leg temperature detectors can also be used to infer RHR flow during the post-accident cool down phase.

DEFICIENCIES

Aging, peak temperature and radiation.

JUSTIFICATION FOR CONTINUED OPERATION

The only feasible failure modes for the RTD's are either an open circuit or a ground. Either failure mode results in zero reading which would tell the operators that the unit had obviously failed and could not be used to monitor temperature.

The operator also has backup temperature measurements from the core exit thermocouples and qualified narrow range RTDs. Although the thermocouples are not safety grade equipment, they are simple devices and do not require a power source.

The wide range RTD signals are incorporated in the Overpressure Protection System (OPS) logic. The OPS serves to prevent reactor vessel overpressurization at low temperatures (<350 F). A pressurizer power-operated relief valve (PORV) trip open condition will be initiated if two-out-of-three OPS channels sense an overpressure condition. The failure of two wide range RTDs at pressurized conditions could result in the opening of the PORVs. The operator can use RCS pressure and backup temperature (core exit thermocouples and narrow range RTDs) measurements to determine if the PORV trip open signal was spurious. Corrective action would be to close the PORV block valves.

The testing on the Sostman RTD's reported in WCAP-9157 was extensive and no failures were reported. The LOCA simulation included testing at 340 F and 66 psi which envelopes the Indian Point Unit 3 conditions. Irradiation was to 10⁸ rad. The post-accident 1 year dose for Indian Piont Unit 3 is less than 2 x 10⁷ rads. The normal full power dose rate at the RTD is less than 500R/hr. This would indicate a lifetime of approximately 15 years and the ability to withstand the post-accident dose of 2 x 10⁷ rads. Therefore, there is a high degree of confidence that the RTD's will function as required.

Since the only failure modes would be immediately obvious to other operators (no reading), failure of any individual instrument would not mislead the operators.

Therefore, continued operation is justified.

FINAL RESOLUTION

The Sostman RTD's will be replaced with fully qualified RdF units.

EQUIPMENT TYPE:

FLOW, PRESSURE, AND LEVEL TRANSMITTERS

MANUFACTURER:

FOXBORO Ell AND El3 SERIES

FUNCTION:

SI- Recirculation Flow (FT-945A,B);
High Head SI Flow (FT-924A, 925, 926,
926A, 927, 980, 981, 982);
Pressurizer Level (LT-459, 460, 461);
Reactor Coolant Pressure (PT-402, 403)
RHR Recirculation Flow (FT-946A, B, C, D)
H2 Recombiner Flow
Pressurizer Pressure (PT-455, 456, 474)
Steam Generator Level (LT-417A thru D,
LT-427A thru D, LT-437A thru D, LT-447A
thru D)

LOCATION:

CONTAINMENT

DISCUSSION

The Foxboro Ell and El3 transmitters are used to measure pressure, level, and flow in safety-related systems inside containment. The transmitters are used to provide trip functions and to provide the operators with information used for emergency procedures.

QUALIFICATION DEFICIENCY

Test sequence and instrument accuracy.

JUSTIFICATION FOR CONTINUED OPERATION

Testing by Westinghouse was performed and documented in letter NS-PLC-5023 T. M. Anderson (Westinghouse) to E.G. Case (Nuclear Regulatory Commission) dated April 26, 1978. Foxboro Model Ell and El3 -DM-MCA with radiation resistant amplifier (this model transmitter is similar to the El3DH-MCA with radiation resistant amplifiers model) was the subject of the test. The irradiation exposure consisted of an integrated dose of 1.8 x 10/ output of the test units experienced no change as a result of radiation exposure. The transmitters then underwent autoclave testing at the Westinghouse Forest Hills test facility. The profile consisted of chemical spray injection (1.140% boric acid and .17% sodium hydroxide) at the start of the test with a temperature rise to 320 F while maintaining 75 psig. At the end of the initial 20 minutes, the test conditions were gradually reduced to 220 F and held there for 5 1/2 days (equivalent to 4 weeks) before the first unit became inoperable and exceeded the + 25% accuracy limit set for long term monitoring.

Foxboro performed environmental tests on the same type of transmitter and documented it in Report Q9-6005. The profile of the test consisted of steam at 318 F and 90 psig for one hour then decreasing to 228 F and 56 psi for an additional 12 hours. The output of the transmitter decreased by a maximum of 9.00% during the 318 F period and to 5.58% during the 228 F period.

In addition, the following tests were performed by Foxboro on a separate effects testing basis:

- 1. Irradiation testing of various type electronics amplifiers used in transmitters, Report T2-1075.
- Irradiation testing of various electronics amplifiers used in transmitters, Report T3-1097.
- Loss of coolant environment and chemical spray performed on various transmitters, Report T3-1013.
- 4. Loss of coolant environment without chemical spray, supplement to Report T3-1013.
- Irradiation testing of gaskets used in transmitters, Report T4-6045.
- 6. Transmitter amplifier irradiation, Report T3-1068.
- Oil bath transmitter test, Report T4-6061.

All of the above mentioned tests were performed at Franklin Institute Research Laboratory, except the supplement to Report T3-1013 which was performed by Foxboro.

The testing demonstrates that post-accident degradation of the transmitters is a slow, long term process. The transmitters can be expected to function reliably for accident mitigation and provide valid information to the operators. Therefore, continued operation is justified. However, since they perform a long term cooling monitoring function, they will be replaced with fully qualified units.

Although the testing performed involved separate effects tests, no degradation occurred at radiation levels comparable to the Indian Point Unit 3 conditions. Therefore, there is a high probability of operation.

Westinghouse has advised NRC of established accuracy requirements, in percent of span for short term (5 minutes) trip functions and long term (4 months) post-accident monitoring consistent with plant safety analysis as follows.

Allowable Accuracy Tolerances for In-Containment

Transmitters Required to Mitigate or Monitor

the Effects of Postulated Accidents

(Radiation and Environment)

Tra	nsmitter Function	Accuracy Short Term	(Percent of Span) Long Term
1.	Pressurizer Water Level	N/A	<u>+</u> 25
2.	Steam Generator Pressure	+10	<u>+</u> 10
3.	Steam Generator Water Level (Narrow Range)	+10	<u>+</u> 25
4.	Steam Generator Water Level (Wide Range)	N/A	<u>+</u> 25
5.	Steam Flow	-10	N/A
6.	Pressure-Reactor Coolant System (Wide Range)	N/A	<u>+</u> 10
7.	Containment Sump Water Leve	<u>+</u> 10	<u>+</u> 25

The maximum errors determined from the Foxboro testing were -13% for pressure transmitters. (Report T3-1013) and -5.7% to +4% (Reports T3-1013 and T3-1097) for differential pressure transmitters. Report T3-1068 reported 2 failures at 76 MRad in which the output went to 0. It is therefore concluded that failure or errors due to accident conditions would not mislead the operators.

FINAL RESOLUTION

The transmitters will be replaced with qualified units.

was to 10^8 rad. The post-accident 1 year dose for Indian Point Unit 3 is less than 2 x 10^7 rads. The normal full power dose rate at the RTD is less than 500R/hr. This would indicate a lifetime of approximately 15 years and the ability to withstand the post-accident dose of 2 x 10^7 rads. Therefore, there is a high degree of confidence that the RTD's will function as required.

Since the wide range RTD's have no control function and since the only failure modes would be immediately obvious to the operators (no reading), failure of any individual instrument would not mislead the operators.

Therefore, continued operation is justified.

FINAL RESOLUTION

The Sostman RTD's will be replaced with fully qualified RdF units.

EQUIPMENT TYPE:

MOTORIZED VALVE ACTUATOR

MANUFACTURER:

LIMITORQUE

FUNCTION:

RHR ISOLATION VALVES - 744

RCP COOLING WATER SUPPLY - 769 &

797

LOCATION:

PIPE PENETRATION AREA

BACKGROUND

The Franklin Research Center has prepared and submitted to the NRC a Technical Evaluation Report (TER) titled "Review of Licensee's Resolution of Outstanding Issues From NRC Equipment Environmental Qualification Safety Evaluation Reports," dated June 9, 1982. The NRC used this TER to prepare a Safety Evaluation Report (SER), which was sent to the Authority by letter dated December 30, 1982. The SER requested that the Justification for Continued Operation be reviewed and revised for any equipment judged to have qualification deficiencies. This exhibit provides resolution of the concern identified in the SER.

QUALIFICATION DEFICIENCY

The deficiency identified in the TER is that documentation from the manufacturer identifying the applicable test reports and aging degradation is missing.

LOCATION AND SAFETY FUNCTION

These actuators are located outside containment in the Pipe Penetration Area. The safety function performed by these actuators is to open and close various valves to control the flow of fluids associated with RHR and Reactor Coolant Pump Cooling Systems.

JUSTIFICATION FOR CONTINUED OPERATION

These actuators have Class B insulation and are used outside of containment in the Pipe Penetration Area. The only harsh parameter in this location is 3.6 Mrad (max.) integrated nuclear radiation dose. None of the Limitorque test reports indicate that radiation dose of this relatively low magnitude would preclude the valves from performing their safety function. Further, the previous TER issued by FRC on April 6, 1981 states:

"FRC EVALUATION:

The Licensee has not established that the cited references are directly applicable to this

equipment; this can be done only by obtaining a statement from Limitorque. However, from a general knowledge of this equipment and the fact that the Licensee states that only the radiation exposure increases significantly as a result of an accident, FRC believes that the Licensee will be able to demonstrate conclusively that this equipment is qualified.

FRC recommends that the Licensee review the vendor's data on aging for the electrical components in this equipment and make a conservative estimate of qualified life."

In addition, since these actuators have Class B insulation and their function is performed early in the accident, there is substantial assurance that the actuators will operate.

In view of the information presented above and because the only deficiencies identified were lack of written evidence of traceability to a specific test report and aging analyses, continued operation is justified.

RESOLUTION OF QUALIFICATION DEFICIENCY

The actuators on motor operated valves 744, 769 and 797 will be replaced with qualified units.

EQUIPMENT TYPE: FLOW TRANSMITTER

MANUFACTURER: ROSEMOUNT 1151

FUNCTION: MAIN STEAM FLOW

FT-419B; FT-429B; FT-439B; FT-449B

LOCATION: CONTAINMENT

DISCUSSION

The Rosemount 1151 transmitters are used to measure flow in a safety related system inside containment. These transmitters are used to provide trip functions, and to provide information to the operators.

QUALIFICATION DEFICIENCY

The concern identified in the qualification report for these transmitters is that they need to be sealed to prevent the intrusion of moisture.

JUSTIFICATION FOR CONTINUED OPERATION

Qualification testing was performed on a Rosemont 1151 DP. The tested transmitters were from the same order as the installed units. This unit was sealed or encapsulated with RTV-21 silicone compound to prevent intrusion of moisture. It satisfactorily completed testing on May 21, 1984. The transmitter was preaged to an equipment life of 15 years, subjected to a radiation level of 1.53 Mrads and to steam and chemical spray for 1.5 hours. The transmitter maximum error was approximately - 6% which is within the allowable limits specified (-10%) by Westinghouse for the Main Steam Flow Transmitters.

These transmitters supply inputs into the Reactor Protection System and the Engineered Safeguards System. The Engineered Safeguards System actuation is a high steam line flow as sensed by 1 out of 2 transmitters on a steam line for 2 out of 4 steam lines coincident with a low average temperature signal or a low steam line pressure signal. This is to protect the plant from a main steam line break down stream of the main steam isolation valves.

The Authority at this time has sealed one train (Train A) of these transmitters consistent with the sealing performed as part of the qualification program. This will ensure that one transmitter on each steam line will be capable of operation independent of the environment that it is exposed to. It also must be noted that the protection provided by these transmitters will be accomplished before the

environment reaches the extremes that could result from an accident condition. Subsequent failure of these transmitters would not affect any other safety-related equipment or mislead the operators.

Therefore, continued operation is justified.

FINAL RESOLUTION

The remaining transmitters will be sealed consistent with qualification reports or the transmitters will be replaced with qualified units.

EQUIPMENT TYPE:

SOLENOID OPERATED VALVE

EQUIPMENT MANUFACTURER: LAURENCE MODELS 110114 and 12544W

FUNCTION:

PROVIDES AIR SUPPLY TO OPEN AND CLOSE THE MAIN STEAM ISOLATION

VALVES

LOCATION:

STEAM AND FEEDLINE PENETRATION AREA

DISCUSSION

The Franklin Research Center has prepared and submitted to the NRC a Technical Evaluation Report (TER) titled "Review of Licensee's Resolution of Outstanding Issues From NRC Equipment Environmmental Qualification Safety Evaluation Reports," dated June 9, 1982. The NRC used this TER to prepare a Safety Evaluation Report (SER), which was sent to the Authority by letter dated December 30, 1982. The SER and Appendix D of the TER identifies two equipment items for which the Authority's Justification for Continued Operation was judged to be inadequate. This exhibit provides resolution of the concern addressed in the SER.

QUALIFICATION DEFICIENCY

The concern identified in the TER for the Laurence SOV's is that qualification documentation was not available.

LOCATION AND SAFETY FUNCTION

This equipment is located in the Shield Wall Area at El. 43'0". This enclosure provides weather protection for the main steam and boiler feed piping. Sheet metal paneling similar to that used in other areas of the plant is fastened to stringers which are jointed to the structural steel. A steam line break will cause the panels to fail, allowing steam to escape to the building exterior and preventing further pressure buildup.

LOCATION AND SAFETY FUNCTION (cont'd)

High energy lines in this enclosure are the main boiler feed lines upstream and downstream of the check valves, main steam lines upstream and downstream of the main stop valves, and steam supply lines to the AFP turbine. Pipe whip restraints are provided for the seismic Class I portion of these lines where necessary to prevent damage to adjacent Class I steam or feedwater lines. Other safety-related equipment in the area are the main steam isolation and main steam relief valves.

Temperature buildup in the area would not be significant since the exterior wall siding would blow off almost immediately following a break. The main steam isolation valves (MSIVs) are signaled to close immediately upon steam line break.

Main steam isolation valve controls must function to isolate all main steam lines in the event of a full MSLB downstream of the stop valves. The MSIV control SOVs are protected by adequate distance from postulated breaks at locations downstream of the stop valves. Hence, the control circuits would have performed their function before any temperature effects could build-up to impair their operation. Failure of the solenoid would not affect other safety-related equipment or mislead an operator.

EQUIPMENT DESCRIPTION

The Laurence SOV's are part of a packaged operating system supplied with the main steam isolation valves (MSIVs). Figure 1 shows the configuration and provides a description of the system operation. Figure 2 shows schematically the power supplies for the solenoid valves, demonstrating that the redundant SOV's shown on Figure 1 are powered from separate buses, and that the system, therefore, is not subject to a single disabling failure.

Figure 3 is an assembly drawing of a Laurence SOV. The configuration corresponds to the supply valve of Figure 1. In normal operation the lever arm (A) is held in the open position by latch (B). The spring (C) holds one

EQUIPMENT DESCRIPTION (cont'd)

latch in position. In this configuration the solenoid is deenergized and the valve plug (F) is held off the seat against the force of spring (D). When the solenoid coil is energized the plunger (E) is pulled upwards, disengaging the latch (B) from the lever arm (A). Spring (D) then forces the valve plug (F) to the closed position.

The solenoid dump valves function similarly. The only difference is that the spring force causes the valve to open.

FAILURE MODE ANALYSIS

The only failures which would prevent the valves from performing their function (refer to Figure 3) are:

- 1) Failure of spring (D).
- 2) Open or short-circuit in solenoid coil or coil connections.
- 3) Binding or sticking between the lever (A) and latch (B).
- parts are type 303 stainless steel (viz., plug (D), spring (F) and washer (G)), and the fluid is air. At normal ambient temperatures, the corrosion of stainless steel in air is negligible. Operating experience with installed valves at Indian Point 3 for a period of about 6 years has shown no spring failures in 16 valves when periodically tested as required by the Technical Specifications. Even if the spring force should be reduced, the weight of the lever arm (A) and the direction of flow would provide the necessary force to move the valves to their proper positions.
- 2) Open or Short Circuit in Solenoid Coil or Coil Connections. The valve is normally deenergized and located in an area where the ambient temperature is 105°F (or less). Aging degradation of the Class H coil is negligible (rated for continuous duty at approximately 350°F). As

FAILURE MODE ANALYSIS (cont'd)

noted for the springs above, no failures or anomalies of the coilds or connections have been identified by the periodic testing required by the Technical Specifications. Random failure of a coil would not preclude system operation because the design is "single-failure-proof".

Binding or sticking between the lever are (A) and latch (B). If high friction from metal-to-metal contact between the latch and lever arm (or between the latch and the solenoid plunger) occurred, the coil force to cause valve actuation would increase. If friction forces resulted in binding, the solenoid would not produce sufficient force to actuate the valve. To preclude such events, the moving parts of the operating mechanism are periodically lubricated. They are also tested as required by the Technical Specifications to demonstrate operability.

As noted above, aging of the solenoid coil is not of concern. However, the Buna-N material used in the valve disc is subject to aging. Because there is no data available in the published literature for Buna-N as used in the SOV's, a qualified life cannot be established. Data on Buna-N seals (gaskets and "O" rings) have indicated lifetimes between 6 and 15 years at 135°F. Since, in this valve application, the material is normally unstressed, engineering judgement would indicate that a life of 15 years (the upper bound for stressed materials) could be anticipated. If some degradation occurs it would not prevent the valve from shutting off the air supply, even if some seal leakage occurred. Even with seal failure the valves would operate. As noted above, periodic testing assures that no significant degradation has occurred.

It is, therefore, concluded that there is no credible failure mode that would prevent the valves from functioning.

JUSTIFICATION FOR CONTINUED OPERATION (Revised)

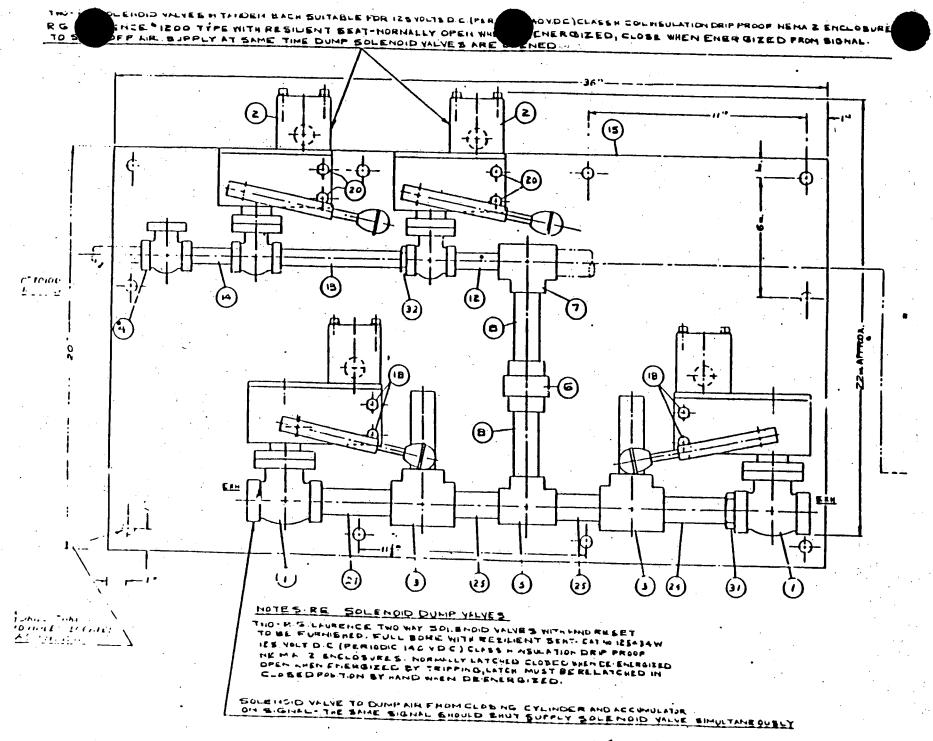
Continued operation is justified because:

- There are no credible failure modes which would prevent the valves from operating.
- Engineering judgement indicates that qualified life has not been exceeded.
- 3) The instrumentation that initiates protective action in the event of a steam line break is not exposed to the accident environment and will function to actuate the solenoids and trip the valves. The operating time from SOV actuation to MSIV closing is less than 5 seconds. This time is verified by periodic testing.
- 4) The temperature and pressure in the area where the solenoids are located would not significantly increase over ambient in the event of a steam line break before isolation of the break could occur.
- 5) The systems in which the valves are located are "single-failure-proof".
- 6) The only break that could affect the solenoids is a break in the piping upstream of the MSIV with which the SOVs are associated. Blowdown of other steam generators in such an event is prevented by the check valves installed in the main steam lines upstream of the MSIVs.
- 7) Valve failure after trip would not affect other safety-related equipment or mislead the operators.

RESOLUTION OF QUALIFICATION DEFICIENCY

The valves will be replaced by qualified valves.

FIGURE 2



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SHIES TO THE STATE OF THE STATE	MARK CUSTOMER RO. REQ USER P. A.S. N. Y. LOCATION INDIAN POINT # 3 Int 10 throw mouting as it sold to be selected for the Coholic Condition of the Coholic	CPERATING TEMP'SAMBIENT FLOW RATEAP TYPE CONNECTIONS CL. 250 SCREWED SOLENOID ENCLOSURE NEM A 2 JAK VOLTS DC CONT: INTI- COIL INSULATION CLASS H DIMENSIONS: A. 21/2" B. 83/4" C. 8" D. 41/2" NET WEIGHTE CURRENT DATA: 0.2 AMPS HOLDING Q.2 AMPS INRUSH AT 13 E VOLTS, DC REFER TO BULLETIN SERIES 1100 LAURENCE SERIAL NO 21371-2
VALVI IT SHOWN IN THE OPEN OR WELFT LATER CONDITIONS FAIRS CLOSED WROM EMERSIVATION	Maive poor can be potated by the four foliations to facinitate beginning to be setting by blow- ste instanction snell	REFER TO BULLETIN SERIES 1100

ENCLOSURE & TO IPN-84-63 MAINTENANCE AND SURVEILLANCE PROGRAM

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286

Maintenance and Surveillance

The existing maintenance program at Indian Point Unit No. 3 has been based on information contained in The Manufacturers' Technical Manuals. These documents, however, do not contain specific information on age related degradation.

During the past year, aging analyses have been performed for the degradable materials in the safety-related equipment which could be exposed to harsh environmental parameters.

The results of the aging analyses will be used in conjunction with failure modes and effects analyses for the safety-related equipment and single failure analyses of the systems in which they are installed to determine whether:

- 1. Age related degradation can result in equipment failure or degrade equipment performance.
- Common mode failure of redundant equipment could occur as a result
 of age related degradation.

Equipment and/or part replacement schedules will be determined from the analyses so that the equipment is maintained in a qualified state throughout its installed life.

It is recognized that aging analyses are "state of the art" and there is limited data establishing validity for all applications. Therefore, the aging analyses will be supplemented with actual performance (in similar or worst environments) of the same equipment used in fossil fueled power plants, petrochemical plants, heavy industry, and chemical plants to verify the effects of aging and to determine actual failure modes and failure rates.

Systematic monitoring and data diagnosis will be employed to evaluate the condition of equipment having degradable materials when the degradable property can be determined or directly inferred.